

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Local Number Portability Porting Interval and Validation Requirements)	WC Docket No. 07-244
)	
Proposals for Standardized Data Fields for Simple Port Requests)	
)	
)	

**COMMENTS OF COMCAST CORPORATION
AND COX COMMUNICATIONS, INC.**

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Comcast Corporation (“Comcast”) and Cox Communications, Inc. (“Cox”) hereby submit these joint comments in response to the Wireline Competition Bureau’s request for comment on two competing Standard Local Service Request Data Field recommendations submitted to the Federal Communications Commission (“FCC”).¹

I. INTRODUCTION AND SUMMARY

Local number portability (“LNP”) is a critical element of the framework Congress and the Commission have adopted to enable consumers to enjoy the benefits of voice competition. As the Commission has recognized, “it is critical that customers be able to port their telephone numbers in an efficient manner in order for LNP to fulfill its promise of giving ‘customers flexibility in the quality, price, and variety of telecommunications services.’”² Toward this end,

¹ *Comment Sought on Proposals for Standardized Data Fields for Simple Port Requests*, WC Docket No. 07-244, Public Notice, 24 FCC Rcd 14423 (2009) (DA 09-2569).

² *Local Number Portability Porting Interval and Validation Requirements; Telephone Number Portability*, Report and Order and Further Notice of Proposed Rulemaking, 24 FCC Rcd 6084, ¶ 6 (2009) (“2009 LNP Order”). See also *Telephone Number Portability*, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 8352, ¶ 2 (1996) (noting that the voice competition made possible by the Telecommunications Act of 1996 “is only meaningful if a customer can retain his or her local telephone number”).

the Commission has implemented a number of requirements designed to ensure an efficient, prompt, and seamless number porting process.

In May 2009, the Commission sought comment on whether it should adopt additional rules to streamline or otherwise improve the LNP process, including whether the Local Service Request (“LSR”) form or information fields should be standardized for simple ports.³ On November 2, 2009, the North American Numbering Council’s (“NANC”) submitted a Non-Consensus Recommendation from the Local Number Portability Administration Working Group (“LNPA-WG”)⁴ proposing (1) that fourteen fields (the “LSR fields”) be required to complete simple ports within the one business day porting interval and (2) that these LSR fields be provided using three forms—the LSR form, the End User form, and the Number Portability form.⁵ On November 19, 2009, the National Cable & Telecommunication Association (“NCTA”), Cox, and Comcast jointly filed an alternative proposal that would require service

³ 2009 LNP Order ¶ 19. In response, many parties submitted comments and filings regarding whether and how to standardize required LSR information. *See, e.g.*, Comments of the Alliance for Telecommunications Industry Solutions’ Ordering and Billing Forum, WC Docket No. 07-244, at 5 (Aug. 3, 2009) (noting that “standardization of the LSR is necessary”); Comments of the Nebraska Public Service Commission, WC Docket No. 07-244, at 7 (Aug. 3, 2009) (urging the Commission to “adopt a uniform process for all carriers, which includes standardized . . . LSR forms”); Reply Comments of Cbeyond, Integra, One Communications, and TW Telecom, WC Docket No. 07-244, at 12 (Aug. 31, 2009) (noting that “[s]tandardized fields, forms and responses for simple ports are crucial to ensuring that carriers are able to cope with . . . the one day porting requirement”).

⁴ Note that this proposal was initiated by the Alliance for Telecommunications Industry Solutions’ Ordering and Billing Forum (“ATIS OBF”) and subsequently adopted by the LNPA-WG. For ease of reference, this proposal is hereinafter referred to as the “LNPA-WG proposal.”

⁵ *See* Letter from Betty Ann Kane, Chairman, North American Numbering Council, to Sharon E. Gillett, Chief, Wireline Competition Bureau, Federal Communications Commission, WC Docket 07-244, Attachment #4 (Nov. 2, 2009); Letter from Betty Ann Kane, Chairman, North American Numbering Council, to Sharon E. Gillett, Chief, Wireline Competition Bureau, Federal Communications Commission, WC Docket 07-244, Attachments 4-A, 4-B, 4-C (Dec. 2, 2009) (collectively, “NANC LNPA WG Attachment #4”).

providers to use an LSR form containing only eight LSR fields in order to complete a simple number port.⁶

Comcast and Cox describe below an alternative proposal that would require the completion of nine fields on a coherently organized LSR for a simple number port. In our view, adoption of this proposal would improve the efficiency of the LNP process and, thereby, enhance competition, protect against potential and existing abuses, and maximize the impact of the Commission's newly adopted requirements that serve to streamline the porting process.

II. CONSISTENT WITH THE ACT'S MANDATE, VOICE PROVIDERS SHOULD BE REQUIRED TO COMPLETE AN LSR FORM THAT IS ORGANIZED EFFICIENTLY AND CONTAINS ONLY LSR FIELDS THAT ARE NECESSARY TO EXECUTE A SIMPLE NUMBER PORT

As a general matter, simple number portability involves two processing stages – (1) the validation interval, which is triggered when the new service provider (“NSP”) completes the LSR, thereby providing the old service provider (“OSP”) with the information needed to complete a simple port; and (2) the activation interval, during which the porting process is carried out.⁷ The Commission has taken steps to streamline both porting stages.

With respect to the first stage, the Commission limited to four the number of fields a porting-out provider may require to validate a simple port request.⁸ With respect to the

⁶ See Letter from Cindy Sheehen, Senior Director, National Customer Activation & Repair, Comcast Corporation, Jose Jimenez, Executive Director, Regulatory Affairs-Policy, Cox Communications, Inc., Jerome F. Candelaria, NANC Representative, NCTA, to Sharon E. Gillett, Chief, Wireline Competition Bureau, Federal Communications Commission, WC Docket No. 07-244 (Nov. 19, 2009).

⁷ Note that the validation interval is sometimes referred to as the confirmation interval. See *Telephone Number Portability*, Second Further Notice of Proposed Rulemaking, 19 FCC Rcd 18515, ¶¶ 4-5 (2004) (“*Intermodal Number Porting Interval Second Further Notice*”).

⁸ Specifically, the Commission required that LNP validation for simple ports require no more than: (1) a 10-digit telephone number; (2) a customer account number; (3) a 5-digit zip code; and (4) a pass code (if applicable). *Telephone Number Requirements for IP-Enabled Services Providers; Local Number Portability Porting Interval and Validation Requirements*, Report and

activation interval, the Commission required that simple wireline-to-wireline and intermodal port requests be completed in one business day.⁹ Taken together, these Commission actions should have ensured a timely, seamless LNP procedure that overcomes “the incentives that providers have to obstruct the porting process.”¹⁰ Unfortunately, certain providers continue their efforts to undermine the Commission by requiring the use of multiple forms and numerous fields that plainly are not needed to validate and process a simple port LSR.¹¹ Moreover, the LSR form(s) proposed by the LNPA-WG will continue to include numerous additional fields that are unrelated to a simple port and which must be left empty or the LSR will be rejected.¹² Beyond the visual clutter, extraneous forms and fields greatly increase the complexity of, and opportunity for errors in, the simple port ordering process.

The Commission must prevent imposition of these unnecessary forms and fields that can only inject unjustified delay and inconvenience into the porting process. The Communications Act of 1934, as amended (the “Communications Act” or “Act”), defines the term “number portability” as “the ability of users of telecommunications services to retain, at the same location, existing telecommunications numbers without impairment of *quality, reliability, or convenience* when switching from one telecommunications carrier to another.”¹³ Requiring the completion or

Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, 22 FCC Rcd 19531, ¶ 47 (2007) (“2007 LNP Order”).

⁹ 2009 LNP Order ¶ 7.

¹⁰ 2007 LNP Order ¶ 42.

¹¹ See, e.g., Petition for Clarification and for Limited Waiver for Extension of Time of One Communications Corp., WC Docket No. 07-244 (Feb. 5, 2009).

¹² See NANC LNPA WG Attachment #4 at 4-B p.1 (referencing additional “conditional” or “optional” fields). While additional fields may be labeled as “conditional” or “optional,” providers are forced to locate the required fields among the numerous fields on the large porting form(s) in order to complete a simple porting request.

¹³ 47 U.S.C. §153(30) (emphasis added). The Commission’s rules define the term identically. 47 C.F.R. §52.21(n).

even the viewing of additional unnecessary fields on a graphical user interface (“GUI”) and the use of multiple forms for manually processed ports would be flatly inconsistent with these statutory goals, because any of these activities would reduce the *quality, reliability, and convenience* of the process for end users.

As the Commission has noted, “problems associated with LNP validation have the potential to lengthen significantly the overall porting process beyond the time period specified.”¹⁴ Further, the Commission repeatedly has affirmed that providers may not take steps designed to delay number ports, specifically noting that the “porting-out provider may not require more information than is a minimal but reasonable amount from the porting-in provider to validate the port request and accomplish the port.”¹⁵ The fact that certain members of the industry have agreed to search for the appropriate fields, to provide additional information for simple ports, or to attach multiple forms to the LSR does not demonstrate that the information is necessary to process and execute the port request or that requiring the inclusion of the information and submission of additional forms is in the public interest. Accordingly, the Commission must ensure that any LSR form implemented compels new service providers to supply only the information needed to complete a simple port promptly and efficiently, and that the required fields are organized together.¹⁶ In fact, regardless of the number of fields the Commission ultimately decides are required to process simple ports, the fields should be united

¹⁴ 2007 LNP Order ¶ 44.

¹⁵ *Id.* ¶ 42. See also Letter from John B. Muleta, Chief, Wireless Telecommunications Bureau, FCC, to John T. Scott, III, Vice President and Deputy General Counsel, Verizon Wireless, and Michael F. Altschul, Senior Vice President and General Counsel, CTIA, 18 FCC Rcd 13110, DA 03-2190 at 3 (2003) (noting that providers may not refuse to port “for other reasons unrelated to validating a customer’s identity”).

¹⁶ See 2009 LNP Order ¶ 19 (seeking comment on “whether there are additional ways to streamline the number porting processes or improve efficiencies for simple and non-simple ports” including whether it is “appropriate to standardize Local Service Request forms”).

on a single screen or page for the ease of the submitting provider and for a higher degree of accuracy in LSR submissions.

III. THE COMMISSION SHOULD FIND THAT NO MORE THAN NINE LSR FIELDS ARE NECESSARY TO VALIDATE AND ACCOMPLISH A SIMPLE PORT

Comcast and Cox support the industry's efforts to standardize the LSR fields necessary for simple ports because the adoption of "uniform national standards in this area will promote efficient and consistent use of number portability methods . . . and facilitate the ability of carriers to meet number portability implementation deadlines."¹⁷ To "remain vigilant . . . to improve the effectiveness and efficiency of the porting process," however, the Commission must avoid mandating unnecessary LSR fields.¹⁸ Comcast and Cox urge the Commission to require no more than nine of the LNPA-WG's proposed fourteen LSR fields.

A. The LNPA-WG proposal includes five extraneous LSR fields that are unnecessary to validate or activate a simple port request and should not be required.

As outlined below, the LNPA-WG proposal includes five fields that are not required to complete a simple port and, consequently, should be excluded from the standardized LSR fields.

1. CCNA (Customer Carrier Name Abbreviation)

The CCNA field includes a carrier identification code. Although Comcast and Cox recognize that carrier information is needed, ample carrier identification information is available in other fields. The CC (Company Code) field identifies the exchange carrier initiating the transaction, and the NNSP (New Network Service Provider) field identifies the NPAC Service Provider Identifier ("SPID") of the new NSP. Accordingly, the CCNA field represents the *third* time in the proposed *fourteen* fields that carrier identification information is provided. As the

¹⁷ *Telephone Number Portability*, Second Report and Order, 12 FCC Rcd 12281, ¶ 52 (1997).

¹⁸ *2009 LNP Order* ¶ 19.

Commission has previously found, “carriers need only share *basic* contact and technical information sufficient to allow porting functionality and customer verification to be established.”¹⁹ The CC and NNSP fields are linked to more than basic contact information, and requiring that this information be provided yet again via the CCNA field is clearly unnecessary for purposes of validating and completing a simple port.

2. REQTYP (Requisition Type and Status)

The LNPA-WG argues that the REQTYP field is necessary to “determine the type of order to be processed.”²⁰ As a general matter, the REQTYP field contains an alphabetical value that corresponds to a request for a specific change activity. When a simple porting LSR is submitted, the only type of order to be processed is a simple porting order, and value “C” is the only REQTYP for number ports. Accordingly, because every simple porting LSR inherently requests a number port, the value for REQTYP on a simple porting LSR will be listed as “C” in *each and every* instance. The industry has already recognized this fact. As the ATIS OBF stated in its Assumptions documents for LSR-required fields, “[a] decision was made to consolidate all number portability only ordering under REQTYP=C.”²¹ In the very document in which NANC submitted the LSR field proposal to the Commission, the LNPA-WG itself noted that REQTYP “C” is the value associated with number portability.²² This field “states the obvious” and is not needed to carry out a simple port.

¹⁹ *Telephone Number Portability; CTIA Petitions for Declaratory Ruling on Wireline-Wireless Porting Issues*, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 23697, ¶ 34 (2003) (emphasis added).

²⁰ *NANC LNPA WG Attachment #4* at 4-B p.5.

²¹ *Id.* at 4-A.

²² *Id.* at Non-Consensus Recommendation p. 2.

3. ACT (Activity)

The ACT field is designed to “identif[y] the activity involved in this service request.”²³ As with the REQTYP field discussed above, this field is unnecessary. The only possible “activity” that can take place after a porting LSR is submitted is the porting of a telephone number. The fact that there is only one possible value for this field has led AT&T to complete the ACT automatically as a “non-editable” prefilled value that cannot be changed when filling out their porting LSR.²⁴ It is particularly telling that the ATIS OBF does not include the ACT field in the Simple Port Service Request Preparation Guide that describes all fields “that have been identified and agreed to by OBF members as necessary to accomplish wireline-to-wireline simple ports from a provisioning perspective.”²⁵ Numerous ports have been successfully accomplished without this field using the voluntary ATIS OBF guidelines, and there simply is no justification for adding the ACT field at this time. Omitting unnecessary requirements such as the CCNA, REQTYP, and ACT fields will help to “ensure that customers can port their numbers without impairment of the convenience of switching providers due to delays in the process that can result when additional information is required.”²⁶

²³ *Id.* at 4-B p. 2.

²⁴ See Local Service Request, AT&T, *available at*: <<http://www.corp.att.com/lnp/lsr.html>>; Local Service Request Help, AT&T, *available at*: <http://www.corp.att.com/lnp/lsr_help.html>.

²⁵ See Letter from Thomas Goode, ATIS General Counsel, to Dana Shaffer, Chief, Wireline Competition Bureau, FCC, WC Docket No. 07-244, at 1 (Jan. 16, 2008), and attached *ATIS Simple Port Service Request Preparation Guide – Local Service Ordering Guidelines Industry Support Interface*, ATIS-0405085-0801. See also *ATIS Simple Port Service Request Preparation Guide – Local Service Ordering Guidelines Industry Support Interface*, ATIS-0405085-0801, Version 3, attached to letter from Thomas Goode, ATIS General Counsel, to Dana Shaffer, Chief, Wireline Competition Bureau, FCC, WC Docket No. 07-244 (July 2, 2008) (submitting a revised guide that also does not include the ACT field).

²⁶ 2007 LNP Order ¶ 43.

4. AGAATH (Agency Authorization Status)

The AGAATH field purports to indicate “that the [carrier] is acting as an end user’s agent and has authorization on file.”²⁷ The Commission has made it clear, however, that the OSP is neither obligated nor permitted to take steps to ensure that the NSP is the authorized agent for a port request. The Commission previously concluded that use of four validation fields was sufficient to guard against slamming.²⁸ As the Commission noted at that time, by adopting fields that rely on numbers and alphanumeric codes, “consumer concerns about slamming” are appropriately balanced “with competitors’ interest in ensuring that LNP may not be used in an anticompetitive manner to inhibit consumer choice.”²⁹

In a parallel situation, the Commission specifically found that no such evidence of authorization may be required. In 2005, the Consumer and Governmental Affairs Bureau denied a petition for declaratory ruling filed by a coalition of rural LECs seeking approval of their practice of rejecting carrier change submissions where information in the change submission, such as the customer name or telephone number, differs from their internal records.³⁰ The rural LECs asserted that, where this information differs, there is insufficient evidence of customer authorization and the proper course of action is to reject the carrier change request.³¹ The Bureau denied the petition, holding that “[t]he executing carrier may not make an independent determination regarding whether the person authorizing the switch was an authorized agent of

²⁷ *NANC LNPA WG Attachment #4* at 4-B p.2.

²⁸ *2007 LNP Order* ¶ 49.

²⁹ *Id.*

³⁰ *Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumer’s Long Distance Carriers; LEC Coalition Request for Declaratory Ruling Regarding Carrier Change Verification*, Declaratory Ruling, 20 FCC Rcd 10599 (2005).

³¹ *See id.* ¶¶ 3-4.

the party identified on the executing carrier's account.”³² The Commission subsequently upheld the Bureau's ruling, reiterating that “executing carriers could use the verification process as a means to delay or deny carrier change requests in order to benefit themselves.” The Commission further observed that while re-verification requests “could, under certain circumstances, help deter slamming . . . the anti-competitive effects of re-verification outweigh[] the potential benefits.”³³

Moreover, the industry itself has indicated that authorization information is not necessary for porting. In May 2005, the LNPA-WG submitted a Position Paper to NANC that stated that porting should not be predicated on the OSP obtaining a physical copy of the evidence of authorization from the NSP. As the submission noted, “[i]n the event of an end user allegation of an unauthorized change, the New Local Service Provider shall, upon request and in accordance with all applicable laws and rules, provide evidence of authorization to the Old Local Service Provider.”³⁴ Similarly, the ATIS OBF Simple Port Request Preparation Guide states that the port preparation process implicitly assumes that “the requisite current letter of authorization

³² *Id.* ¶ 8.

³³ *Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers; LEC Coalition Application for Review Regarding Carrier Change Rules*, Order, ¶ 6 (2008), citing *Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers*, Second Report and Order and Further Notice of Proposed Rulemaking, 14 FCC Rcd 1508, ¶ 99 (1998).

³⁴ Letter from Robert C. Atkinson, Chair, North American Numbering Council, to Mr. Thomas Navin, Chief, Wireline Competition Bureau, Federal Communications Commission (June 14, 2005), Attachment 2 – LNPA WG Position Paper (May 13, 2005). This finding was included in the Number Portability Best Practices document and was submitted to the Commission for endorsement with a request from NANC that the Commission “take any . . . steps that may be necessary to encourage service providers to abide by” the LNPA WG finding. *Id.* See also Letter from Robert C. Atkinson, Chair, North American Numbering Council to Mr. Thomas Navin, Chief, Wireline Competition Bureau, Federal Communications Commission (Jan. 5, 2006).

has been obtained and is on file with the submitting service provider.”³⁵ In light of the Commission and industry consensus that authorization information is not needed for porting, the AGAUTH field should be rejected.

5. TEL NO (INIT)

The TEL NO field would provide the OSP with the telephone number of the NSP contact who initiated the porting request. This field is redundant and, thus, completely unnecessary. As noted above, the NNSP field contains the carrier’s SPID, which is linked to detailed contact information.³⁶ Moreover, it is standard industry practice for service providers to exchange trading partner profiles, which include contact information, before they begin to port telephone numbers between one another.³⁷ This exchange of trading partner profiles ensures that basic contact information is transmitted efficiently. Conversely, requiring providers to provide this information in conjunction with each and every number porting request, as the LNPA-WG proposes, is plainly unnecessary and inefficient.

More fundamentally, use of the telephone to resolve porting issues has become almost obsolete in today’s electronic world. If an LSR is submitted incorrectly or requires clarification,

³⁵ *ATIS Simple Port Service Request Preparation Guide – Local Service Ordering Guidelines Industry Support Interface*, ATIS-0405085-0801, Version 3, at Section 1.6, attached to letter from Thomas Goode, ATIS General Counsel, to Dana Shaffer, Chief, Wireline Competition Bureau, FCC, WC Docket No. 07-244 (July 2, 2008).

³⁶ All providers with connectivity to the NPAC are required to establish a SPID, which, in turn, requires that the provider file contact information including a telephone number that is made available to all other NPAC providers. *Best Practices Document 50, Alternative SPID Field Introduced in NANC 399*, Local Number Portability Working Group, available at: <<http://www.npac.com/cmas/LNPA/>> (Nov. 25, 2006); *NeuStar New User Application*, NPAC/SMS Services – United States, Version 2.5, available at: <http://www.npac.com/documents/docs/US_NPAC_Application.pdf> (April 11, 2006).

³⁷ A sample Trading Partner Profile is available at <http://www.npac.com/cmas/co_docs/TradingPartnerForm.doc>. Comcast has designed its porting system such that standard profile questions are included as part of the company’s Port Out Automation Tool (“PAT”). This type of automation ensures that all carriers provide the same information without requiring that this information needlessly be included on each LSR form.

the OSP typically rejects or questions the LSR through the same means by which it received the LSR. In other words, if the LSR was submitted via a GUI, e-mail, or electronic data interchange (“EDI”), the LSR is rejected or questions are posed to the NSP through GUI, e-mail, or EDI. Indeed, attempting to contact the NSP by telephone may actually *delay* the porting process. Individuals frequently work remotely, checking e-mail and electronic databases from home or another remote location. Attempting to contact these individuals through a phone call to their “work line” is plainly not the most efficient way to resolve porting issues. In short, because the TEL NO field is unnecessary and may actually delay the porting process, the field should be excluded from the LSR form.

B. Given the fundamental importance of emergency communications, Comcast and Cox do not oppose inclusion of the NPDI field in the LSR form.

The information contained in the NPDI (Number Portability Direction Indicator) field identifies “the direction of LNP conversion activity and the Enhanced (E) 9-1-1 data base record activity requirements for this request.”³⁸ Comcast and Cox continue to believe that this field is not needed in most porting scenarios because industry standards and practices already result in the timely unlocking and migrating of an end user’s address record for E-911 services. Comcast and Cox, however, also recognize the critical importance of ensuring that all E-911 information is transmitted in the most convenient and efficient manner in every instance, even if the field is only necessary for a small percentage of ports. Accordingly, after further consideration,³⁹ Comcast and Cox do not object to the inclusion of this field in the LSR form.

³⁸ *NANC LNPA WG Attachment #4* at 4-B p.2.

³⁹ At the time the proposed LSR fields were reduced from the previously recommended 21 fields to 14 fields, NANC provided its members with only a brief time to review and express its position on the fields to be included. An e-mail requesting comment on the necessary fields was circulated late in the evening on Friday, October 23, 2009, and comments were due by noon on Monday, October 26, 2009. On the following Wednesday, October 28, 2009, NANC LNPA-WG members were allowed only *eight hours* to respond to the final proposed fields. *See, e.g.*, E-mail from Jerome F. Candelaria, NANC Primary Representative for NCTA, to Betty Ann Kane,

C. The Commission should find that providers may require only the submission of a single LSR form containing the NPDI field and the remaining eight fields proposed by the LNPA-WG in order to validate and activate a simple port.

In the view of Cox and Comcast, the NPDI field and the remaining eight fields proposed by the LNPA-WG and previously agreed to by NCTA, Cox, and Comcast provide all of the information necessary to validate and effectuate a simple port within the Commission's mandated one business day interval. As an initial matter, three of these are fields that the Commission expressly allowed for purposes of validating a port: (1) the PORTED NBR field identifies the 10-digit telephone number to be ported, (2) the AN field identifies the account number in question, and (3) the ZIP field includes the end user's zip code. The remaining fields serve to ensure timely porting effectuation: (1) the CC field identifies the exchange carrier initiating the transaction, (2) the PON field identifies the customer's porting purchase order number, (3) the VER field identifies the customer's version number in order to permit carriers to track the progress of the porting request, (4) the DDD field identifies the desired completion date for the port, and (5) the NNSP field identifies the NSP's SPID. Mandating the completion of these nine fields in a single LSR form will strike an appropriate balance between accuracy and efficiency by "limiting carriers to requiring a minimum but reasonable amount of information to validate a customer request and perform a port."⁴⁰

Chairperson of the North American Numbering Council (Oct. 28, 2009), appended as Attachment 6 to Letter from Betty Ann Kane, Chairman, North American Numbering Council, to Sharon E. Gillett, Chief, Wireline Competition Bureau, FCC, WC Docket No. 07-244 (Nov. 2, 2009; filed Nov. 3, 2009).

⁴⁰ 2007 LNP Order ¶ 43.

IV. CONCLUSION

For the foregoing reasons, the Commission should adopt a single LSR form containing a streamlined set of no more than nine Standard Local Service Request Data Fields as described herein.

Respectfully submitted,

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February 16, 2010

Certificate of Service

I hereby certify that on this 16th day of February, 2010, a true and correct copy of the foregoing Comments of Comcast Corporation and Cox Communications, Inc. was mailed by electronic mail to:

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